



Buckinghamshire
FIRE & RESCUE SERVICE
we save lives

Local Government Finance Settlement Team
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Provisional Local Government Finance Settlement 2022 to 2023

Dear LGF Settlement Team

This letter represents the response from Buckinghamshire Fire and Rescue Service to the Provisional 2022-23 Local Government Finance Settlement. The Service also refers the Department for Levelling Up, Housing and Communities (DLUHC) to the response from the National Fire Chiefs Council (NFCC).

The Service's response to the Provision Settlement can be summarised as follows:

1. The Service welcomes the proposals set out in the 2022-23 Provisional Settlement.
2. The Service particularly welcomes the £5 principle for the lowest precept raising Fire and Rescue Authorities (FRAs). The Service urges Government to ensure that the principle remains in place for the lowest precept raising FRAs, and while the Service understands that final decisions are for future settlements, a statement of intention for future years council tax flexibilities would aid financial planning.
3. One-off funding is understandable if DLUHC intends on conducting a Fair Funding Review. Whilst the Service understands that future allocations cannot be guaranteed at this stage, the Government should guarantee that funding which has been allocated to FRAs will remain within the sector, particularly FRAs' allocations in the 2022-23 Services Grant.
4. A return to multi-year spending reviews is most welcome and a return to multi-year settlements must follow from 2023-24.

Investment in Fire Protection

The following text was included in the NFCC response to the 2020-21 Technical and Provisional Settlement consultations as well as the response to the 2021-22 Settlement consultation. We believe that it is of primary importance that we continue to highlight the situation regarding protection activity as this is clearly an issue that needs to be prioritised going forward.

"The Hackitt enquiry and HMICFRS have highlighted the significant reduction in the number of fire safety audits in recent years. Across England in 2010-11 there were 84,575 fire safety audits, which by 2018-19 had decreased to 49,327. Whilst the proportion of audits resulting in a satisfactory rating has improved from 56%



to 67% it is unknown whether this is the result of improving fire safety or fewer audits. Clearly there is a need to invest in fire protection activity to increase activity in this area and outcomes for businesses and high-risk properties.

Due to local Integrated Risk Management Planning the way in which Fire and Rescue Services deliver their fire protection activity can vary, with a mixture of delivery by firefighter crews and specialised business safety officers. Cost per audit will also vary as a result, with estimations being between £580 and £1,150 per completed audit. As an illustration, just returning to 2010-11 activity levels requires an additional 35,248 audits, which would equate to an additional investment in excess of £30m. According to Home Office statistics, between 2010 and 2018 there was a reduction in FTE firefighters of 22%; in 2010 there were approximately 42,000 firefighters whilst in 2018 there were 32,000. As a result, the ability for Fire and Rescue Services to delivery business safety activity using firefighter crews has diminished.”

Whilst additional funding announced in the 2022-23 Settlement is welcome, it is difficult to use 'one-off' funding for work that is required on an ongoing basis.

Service Delivery Pressures

The Service has continually highlighted service delivery pressures in previous settlement responses. The Home Office publishes response times annually and consistent data is available going back to 2009-10. In 2009 there were 41,953 full time equivalent firefighters and average response times to dwelling fires with casualties and/or rescues was 6 minutes and 52 seconds in 2009-10. In 2019 the number of FTE firefighters had fallen to 31,995 (a 24% reduction of almost 10,000 firefighters); and response times to dwelling fires with casualties and/or rescues had risen to 7 minutes and 37 seconds (an increase of 10.9%, 45 seconds). Comparing FTE firefighters with response times between 2009 and 2019 shows a strong negative correlation ($R^2=0.80$, $p<0.001$) [see FIRE0101 and FIRE1101 Home Office data].

This serves to paint just part of the picture regarding the risk profile pressures facing the fire and rescue service. It is of course vital that the horrors of the Grenfell Tower tragedy are not forgotten and to note that reductions in firefighter numbers directly impact the availability of personnel to support national resilience capabilities. At present, if a fire of the scale of Grenfell Tower occurred anywhere other than London, it would be a significant challenge for any FRA to resource – even with mutual assistance. Regarding fire and rescue operations post-Grenfell, FRAs faced additional requirements for inspections in high rise properties, even before legislative change.

The sector needs to respond to the inspection process, with findings that whilst responding to emergencies is a strength, Fire Protection is a concern and often under resourced whilst the inconsistent capability to respond to national incidents is highlighted. Long-term investment is required to work together across the sector to deliver improved outcomes.

Covid-19

The Service is grateful to the government for the support with additional costs associated with pandemic response. It should be noted however that the relatively small size of FRA budgets, compared with large local authorities, means that lost collection



fund income, even with the 75% income guarantee, has been a significant pressure for the sector.

Quantum

Generally, the Service recognises the need for increased social care funding, however this must not be delivered at the expense of FRAs' budgets. Therefore, the Service welcomes the fact that proposed increases in social care funding are being met through an increased quantum of local government funding and politely highlights the need for an increased quantum to continue to be the source of any further social care (or other) funding increases.

Fire Pensions Grant

The Service continues to call for the transfer of the Fire Pensions Grant into FRAs' baseline funding, removing the uncertainty which exists when such a significant portion of funding is not guaranteed beyond each year. Continued work conducted by the NFCC shows that FRAs' reserves would very quickly run out should this significant funding stream ever cease.

Multi-Year Settlements

The Service welcomes the focus that the government has clearly placed on stability and certainty within these proposals and expects that this will be consistent across departments. The Service understands that DLUHC has issued a one-year settlement to allow the possibility of conducting the Review of Relative Needs and Resources. Whilst the last few years have been unprecedented, one-year settlements should not be the norm. A return to multi-year Spending Reviews is most welcome and a return to multi-year settlements must follow from 2023-24.

Question 1: Do you agree with the government's proposed methodology for the distribution of Revenue Support Grant in 2022/23, including the rolling in of two New Burdens grants?

Yes. It is of utmost importance that core funding is protected in real terms. The Service asks the Government to guarantee the Sector's funding looking ahead, even if individual FRA allocations are subject to the Review of Relative Need and Resources.

Question 2: Do you agree with the proposed package of council tax referendum principles for 2022/23?

The Service particularly welcomes the £5 principle for the lowest precept raising FRAs. Sensible approaches to shire districts' and police and crime commissioners' referendum principles have been in place for some time, and the Service urges government to ensure that the £5 principle for the lowest eight FRAs remains in place. Whilst the Service understands that final decisions are for future settlements, a statement of intention for future years council tax flexibilities would aid financial planning.



Question 3: Do you agree with the government's proposals for the Social Care Grant in 2022/23?

Question 4: Do you agree with the government's proposals for iBCF in 2022/23?

Question 5: Do you agree with the government's proposals for distributing the Market Sustainability and Fair Cost of Care Fund in 2022/23?

Generally, the Service recognises the need for increased social care funding, however this must not be delivered at the expense of FRAs' budgets. Therefore, the Service welcomes the fact that proposed increases in social care funding are being met through an increased quantum of local government funding and politely highlights the need for an increased quantum to continue to be the source of any further social care (or other) funding increases.

Question 6: Do you agree with the government's proposals for a one-off 2022/23 Services Grant distributed using 2013/14 shares of the Settlement Funding Assessment (SFA)?

The Service agrees that the methodology (SFA) proposed for the 2022-23 Services Grant is suitable and welcomes the additional unringfenced funding. The sector was grateful for early clarification that increased National Insurance costs (due to the Government's Health and Social Care Levy announcement in September) would be compensated. Given the lack of data regarding the specific additional costs that local authorities and FRAs would face due to this announcement, SFA is the most sensible distribution to use.

It is important to note however, that increased NI costs are not one-off. The one-off nature of the 2022-23 Services Grant adds significant uncertainty regarding NI costs for the sector from 2023 onwards.

Understanding that this decision was made by DLUHC in part because of its intention to conduct the Fair Funding Review, the Service asks that the Government commits to protecting the 2022-23 Services Grant funding received by the Fire and Rescue Sector, if not for individual FRAs. It is the view of the Service that whatever the outcome of the Review, the fire sector's increased NI costs must be protected and that the best way to do this would be to announce the intention to protect the total 2022-23 Services Grant allocated to the Sector.

Question 7: Do you agree with the government's proposals for New Homes Bonus in 2022/23?

No comment.

Question 8: Do you agree with the government's proposals for Rural Services Delivery Grant (RSDG) in 2022/23?

The Service is disappointed that RSDG has not been revised. The current methodology fails to recognise pockets of rurality within larger authorities. This means that many FRAs have local authorities within their geographies receiving RSDG, but at FRA-level this rurality is averaged out by other (densely populated) areas.



Question 9: Do you agree with the government's proposal for the Lower Tier Services Grant, with a new minimum funding floor in 2022/23 so that no authority sees an annual reduction in Core Spending Power?

No comment.

Question 10: Do you have any comments on the impact of the proposals for the 2022/23 settlement outlined in this consultation document on persons who share a protected characteristic, and on the draft policy impact statement published alongside the consultation document? Please provide evidence to support your comments.

In addition to those pressures that are specific to the FRS (outlined above) the fire service is also facing pressures like those in the wider public sector. One of the most significant demands on the public sector is an aging population; for FRAs this is highlighted by the stark differences in fire-related deaths for different ages.

In 2019-20, 51% of fire-related death victims were aged over 65 and 22% were aged over 80. Whilst there were just three fire-related deaths for the 17 million people in England aged 24 or under, there were 152 for the 17 million people aged 55 or over, a death rate approximately 50 times higher; for residents over 80 the fire-related fatality rate was 95 times the fatality rate for under 25s [see ONS MYEs and FIRE0503 Home Office data].

The Government's recent Health and Social Care White Paper indicated the government's intent for more people in care to be able to live in their own homes and live as independently as possible. This admirable intent will require more home safety visits and increases the number of dwellings occupied by people who are less likely to be able to put out a fire and increases the risk for FRAs. Further prevention and protection work will be required, and this must be recognised in future funding.

Summary

It is therefore vitally important that the Sector's funding is protected in real terms and in that regard the Service strongly welcomes the Provisional Settlement announcement. The £5 flexibility is most welcome. To aid certainty looking forward the Service asks for a statement of intention regarding future council tax flexibility as well as a guarantee to the Fire and Rescue Sector that 2022-23 Service Grant funding will be protected, even if individual FRA allocations change.

Yours sincerely

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Chief Fire Officer and Chief Executive